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**Counsel to Vir Ventures, Inc. and  
AMI Ventures, Inc.**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: SEARS HOLDING CORPORATION, et al., Debtors.	Bankruptcy No. 18- 23538 (RDD)
VIR VENTURES, INC. AND AMI VENTURES, INC.,  Plaintiffs,  v.  SEARS HOLDING CORPORATION, et al.  Defendant.	Adv. Proc. No.  Related to Documents:

**VERIFIED AFFIDAVIT OF RUPESH SANGHAVI IN SUPPORT OF COMPLAINT  
PURSUANT TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF  
MONEY FROM THE DEBTORS, OR IN THE ALTERNATIVE THE IMPOSITION OF  
A CONSTRUCTION TRUST REGARDING SAME**

**VERIFIED AFFIDAVIT OF RUPESH SANGHAVI**  
**IN SUPPORT OF COMPLAINT PURSUANT**  
**TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF MONEY FROM**  
**THE DEBTORS OR, IN THE ALTERNATIVE, THE IMPOSITION OF A**  
**CONSTRUCTION TRUST REGARDING SAME**

1. I, Rupesh Sanghavi, am the President of the above-captioned plaintiffs ("Plaintiffs") VIR VENTURES, INC. AND AMI VENTURES, INC..

2. I hereby submit this verified affidavit in support of that certain COMPLAINT PURSUANT TO FED. R. BANKR. P. 7001(1) AND (7) FOR THE RECOVERY OF MONEY FROM THE DEBTORS OR, IN THE ALTERNATIVE, THE IMPOSITION OF A CONSTRUCTION TRUST REGARDING SAME ("Complaint") which was filed to initiate the above-captioned adversary proceeding.

3. I can attest the facts set forth therein are true and correct to the best of my knowledge.

*Rupesh Sanghavi*

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Rupesh Sanghavi

Taken, subscribed, and sworn or affirmed before me this 8<sup>th</sup> day of November 2019.

My Commission expires on Dec. 9, 2019



*S. Estrada*

Notary Public

Print: Sara Estrada

<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to in the Complaint.